

Remarks and Arguments

Claims 1-60 have been presented for examination.

Claims 1, 2, 5-10, 18-22, 25-30, 38-42, 45-50 and 58-60 have been rejected under 35 U.S.C. §103(a) as obvious over U.S. Patent Publication No. 2002/0178380 (Wolf, previously cited) in view of U.S. Patent No. 6,604,136 (Chang.). The examiner comments that the Wolf reference discloses the claimed subject matter with the exception that it does not disclose calling specific methods in a resource API in order to configure that resource. However, the examiner contends that the use of API methods to configure resources was well-known at the time that the present application was filed as evidenced by Chang and that it would have been obvious to combine the teachings of Wolf and Chang since both are directed to the same field of endeavor.

Applicants do not disagree with the examiner that the use of API methods calls to configure resources was well-known at the time that the invention was filed. In fact, the invention uses those method calls to configure the resources. However, that does not change the fact that, as disclosed, Wolf does not use these API calls to configure resources. Instead, as set forth in detail in the response to the previous office communication, Wolf constructs configuration files and downloads, or pushes, these files to the resources in order to perform the configuration. Therefore, in the Wolf system, resources can only be configured if they use configuration files. Existing resources that do not use configuration files cannot be configured.

The examiner posits that the existence of API calls should somehow prompt one skilled in the art to produce the present invention. Applicants disagree. In order to arrive at the present invention, Wolf would have to be modified to change its operation from what is specifically disclosed to a substantially different method of operation. This different method of operation is certainly not shown in Chang which is directed to implementing the API method calls rather than to where the calls are coming from. Neither of these references discloses the use of a set of elements to configure a plurality of resources where, in response to a configuration policy request these elements are located and then operated in a coordinated manner to configure the resources in accordance with the policy as set forth, for example, in claim 1 lines 10-18.

Further, other than the existence of resource API method calls, the examiner has cited no motivation for combining these references in a manner that would suggest a substantial modification of Wolf. Thus, applicants believe that the combination of references suggested by the examiner is improper and that the present claims patentably distinguish over the cited combination of references.

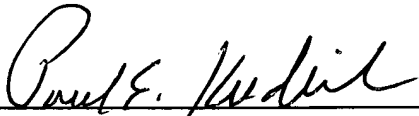
Claims 3, 4, 11-17, 23, 24, 31-37, 43, 44 and 51-57 have been rejected under 35 U.S.C. §103(a) as obvious over Wolf and Chang and further in view of U.S. Patent No. 6,671,776 (DeKoning, previously cited.) This rejection was discussed in detail in the response to the previous office communication. As discussed above, the addition of the teachings of Chang to those of Wolf do not materially change the teachings of Wolf. The response to the previous office communication stated that the DeKoning reference does not disclose any method or mechanism for configuring a network. The examiner disagreed, pointing to DeKoning, column 9, line 2.

Upon re-reading the reference Applicants agree with the examiner that DeKoning does discuss configuring a SAN network using a management console as set forth at DeKoning, column 5, lines 7-18. The manner of configuring that SAN network is discussed at DeKoning, column 7, line 64 to column 8, line 15. There, DeKoning discloses that the SAN network can be partitioned by assigning LUN numbers to various volume clusters. However, beyond that, DeKoning does not discuss how reassigning LUN numbers changes the physical configuration. Some additional mechanism, such as that disclosed in Wolf, or in the present invention, would be necessary to perform the physical configuration. Thus, the disclosure in DeKoning does not supplement the Wolf and Chang disclosures, which are related to physical configuration, to supply the inventive elements that are coordinated by a configuration policy to interact with the resources by calling the resource API set, which element are missing in Wolf and Chang, as discussed above. Since claims 3, 4, 11-17, 23, 24, 31-37, 43, 44 and 51-57 are dependent on one of the independent claims 1, 8, 21, 28, 41 and 48 and incorporate the limitations thereof, they distinguish over the combination of Wolf, Chang and DeKoning in the same manner as the independent claims distinguish over the Wolf and Chang references. Further differences between these claims and the Wolf and

DeKoning references are discussed in detail in the previous response to which the examiner is respectfully directed.

In light of the forgoing amendments and remarks, this application is now believed in condition for allowance and a notice of allowance is earnestly solicited. If the examiner has any further questions regarding this amendment, he is invited to call applicants' attorney at the number listed below. The examiner is hereby authorized to charge any fees or direct any payment under 37 C.F.R. §§1.17, 1.16 to Deposit Account number 02-3038.

Respectfully submitted



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